

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Janice Y. Thomas	:	Chapter 13
	:	No.: 21-11344-AMC
Debtor(s)	:	

**RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC
STAY FILED BY WELLS FARGO BANK, N.A.**

Debtor, Janice Y. Thomas, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Wells Fargo Bank, N.A., hereby submit the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied. Debtor avers she applied for a loan modification and was advised by an agent on behalf of Wells Fargo Bank, N.A. that payments were not necessary during that time.
8. No response.
9. Denied. Debtor avers that she was advised by an agent on behalf of Wells Fargo Bank, N.A. to not make payments while the final modification was pending approval.
10. Denied.
11. No objection.
12. Denied.
13. Denied

14. No response required.

WHEREFORE, based on the aforementioned, Debtors respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

Dated: February 24, 2022

/s/ Brad J. Sadek, Esq.

Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008

CERTIFICATE OF SERVICE

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

Kenneth E. West
Standing Chapter 13 Trustee
Electronic Notice

Andrew L. Spivack, Esq.
Attorney for Movant *Dwelling Series IV Trust*
Electronic Notice to pabkr@brockandscott.com

Dated: February 24, 2022

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street
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